

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MARGO KLINE,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	1:18-cv-01132-MHC-JSA
ATL HAWKS, LLC,)	
)	
Defendant.)	
<hr style="width: 40%; margin-left: 0;"/>)	

DEFENDANT’S NOTICE OF INTENT TO SERVE SUBPOENAS

Pursuant to *Federal Rule of Civil Procedure* 45(a)(4), ATL Hawks, LLC, by and through its undersigned counsel, hereby provides notice that it will serve the attached subpoenas directed to: (1) American Cancer Society; (2) Chabad Intown, Inc.; (3) Spurs Sports & Entertainment; (4) Tampa Bay Rays Baseball; (5) Technology Association of Georgia; (6) UCF Athletics Association, Inc.; and (7) University Athletic Association on Tuesday, June 2, 2020.

Respectfully submitted, this 29th day of May 2020.

/s/Alisa P. Cleek

Raanon Gal
Georgia Bar No. 100281
Alisa P. Cleek
Georgia Bar No. 581063

TAYLOR ENGLISH DUMA LLP
1600 Parkwood Circle, Suite 200
Atlanta, Georgia 30339
Telephone: (770) 434-6868
Facsimile: (770) 434-7376
acleek@taylorenghish.com
rgal@taylorenghish.com

Counsel for Defendant ATL Hawks, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MARGO KLINE,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.
)	1:18-cv-01132-MHC-JSA
ATL HAWKS, LLC,)	
)	
Defendant.)	
_____)	

CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2020, I electronically filed the foregoing **DEFENDANT’S NOTICE OF INTENT TO SERVE SUBPOENAS** using the CM/ECF system, which will automatically send email notification of such filing to the following attorney of record:

Amanda S. Thompson

/s/Alisa P. Cleek _____
Alisa P. Cleek
Georgia Bar No. 581063
acleek@taylorenghish.com

Counsel for Defendant ATL Hawks, LLC

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MARGO KLINE,

Plaintiff,

v.

ATL HAWKS, LLC,

Defendant.

Civil Action No. 1:18-CV-01132-MHC

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**To: American Cancer Society, Inc. (New York)
C T Corporation System, Registered Agent
289 S. Culver Street
Lawrenceville, Georgia 30046

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

Place: Alisa P. Cleek Taylor English Duma LLP 1600 Parkwood Circle, Suite 200 Atlanta, Georgia 30339	Date and Time: Tuesday, June 16, 2020 by 5:00 p.m. EST
--	--

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: June 2, 2020

CLERK OF COURT

Signature of Clerk or Deputy Clerk

OR


Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing **Defendant ATL Hawks, LLC**, who issues or requests this subpoena, is: **Alisa P. Cleek, Esq.; Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339; Email: acleek@taylorengh.com; Telephone: (770) 434-6868.**

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

Civil Action No. 1:18-CV-01132-MHC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* **American Cancer Society, Inc. (New York)** on *(date)* June 2, 2020.

☐ I served the subpoena by delivering a copy to the named person as follows
on *(date)* _____ ; or

☐ I returned the subpoena unexecuted because _____ ; or

☒ other *(specify)*:

☒ other *(specify)*: **American Cancer Society, Inc. (New York), C T Corporation System, 289 Culver Street, Lawrenceville, Georgia 30046-4805**, via U.S. Certified Mail, Return Receipt Requested, on June 2, 2020.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ 0.00 for travel and \$ 0.00 for services, for a total of \$0.00.

I declare under penalty of perjury that this information is true.

Date: June 2, 2020

Server's signature

Shera L. Hayes, Paralegal

Printed name and title

1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339

Server's address

Additional information regarding attempted service, etc:

ATTACHMENT

You are commanded to produce for inspection and copying no later than 5:00 p.m., Tuesday, June 16, 2020, records, documents and correspondence in your possession, custody or control pertaining to the employment and/or potential employment of **MARGO KLINE**, Social Security Number **XXX-XX-5267** date of birth [REDACTED]/1984, at **AMERICAN CANCER SOCIETY, INC. (NEW YORK)**, and/or any of its agents, including, but not limited to: (1) employment applications and resumes; (2) intake questionnaires; (3) interview notes; (4) notes reflecting offers of employment; (5) documents regarding the extension of an offer of employment and acceptance thereof, including that of electronic mail; (6) payroll records; (7) performance evaluations; (8) documentation regarding any disciplinary action taken against **MARGO KLINE**; (9) correspondence and/or letters of resignation from **MARGO KLINE** including that of electronic mail; (10) non-privileged documentation regarding any administrative agency charges or lawsuits filed by **MARGO KLINE** against **AMERICAN CANCER SOCIETY, INC. (NEW YORK)**, and/or any of its agents; (11) all non-privileged documents relating to any allegations of or charges of discrimination and/or unlawful harassment, including but not limited to documents filed with any court; and (12) time sheets or detailed clock in and clock out reports.

PLEASE NOTE:

In lieu of personally appearing with the requested documents at the physical address indicated on the subpoena, it is requested that copies of the documents be emailed to Alisa P. Cleek (acleek@taylorenghish.com), Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339 (Telephone: 770-434-6868).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MARGO KLINE,

Plaintiff,

v.

ATL HAWKS, LLC,

Defendant.

Civil Action No. 1:18-CV-01132-MHC

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**To: Chabad Intown, Inc.
Eliyaho Schusterman, Registered Agent
730 Ponce de Leon Ave.
Atlanta, Georgia 30306

☒ **Production: YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

Place: Alisa P. Cleek Taylor English Duma LLP 1600 Parkwood Circle, Suite 200 Atlanta, Georgia 30339	Date and Time: Tuesday, June 16, 2020 by 5:00 p.m. EST
--	--

☐ **Inspection of Premises: YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
--------	----------------


The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: June 2, 2020

CLERK OF COURT

Signature of Clerk or Deputy Clerk

OR


Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing **Defendant ATL Hawks, LLC**, who issues or requests this subpoena, is: **Alisa P. Cleek, Esq.; Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339; Email: acleek@taylorenghish.com; Telephone: (770) 434-6868.**

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

Civil Action No. 1:18-CV-01132-MHC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* **Chabad Intown, Inc.** on *(date)* June 2, 2020.

☐ I served the subpoena by delivering a copy to the named person as follows
on *(date)* _____; or

☐ I returned the subpoena unexecuted because _____; or

☒ other *(specify)*:

☒ other *(specify)*: **Chabad Intown, Inc., Attn: Eliyahu Schusterman, Registered Agent, 730 Ponce de Leon Ave., Atlanta, Georgia 30306,,** via U.S. Certified Mail, Return Receipt Requested, on June 2, 2020.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ 0.00 for travel and \$ 0.00 for services, for a total of \$0.00.

I declare under penalty of perjury that this information is true.

Date: June 2, 2020

Server's signature

Shera L. Hayes, Paralegal

Printed name and title

1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339

Server's address

Additional information regarding attempted service, etc:

ATTACHMENT

You are commanded to produce for inspection and copying no later than 5:00 p.m., Tuesday, June 16, 2020, records, documents and correspondence in your possession, custody or control pertaining to the employment and/or potential employment of **MARGO KLINE**, Social Security Number **XXX-XX-5267** date of birth [REDACTED]/1984, at **CHABAD INTOWN, INC.**, and/or any of its agents, including, but not limited to: (1) employment applications and resumes; (2) intake questionnaires; (3) interview notes; (4) notes reflecting offers of employment; (5) documents regarding the extension of an offer of employment and acceptance thereof, including that of electronic mail; (6) payroll records; (7) performance evaluations; (8) documentation regarding any disciplinary action taken against **MARGO KLINE**; (9) correspondence and/or letters of resignation from **MARGO KLINE** including that of electronic mail; (10) non-privileged documentation regarding any administrative agency charges or lawsuits filed by **MARGO KLINE** against **CHABAD INTOWN, INC.**, and/or any of its agents; (11) all non-privileged documents relating to any allegations of or charges of discrimination and/or unlawful harassment, including but not limited to documents filed with any court; and (12) time sheets or detailed clock in and clock out reports.

PLEASE NOTE:

In lieu of personally appearing with the requested documents at the physical address indicated on the subpoena, it is requested that copies of the documents be emailed to Alisa P. Cleek(acleek@taylorenghish.com), Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339 (Telephone: 770-434-6868).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MARGO KLINE,

Plaintiff,

v.

ATL HAWKS, LLC,

Defendant.

Civil Action No. 1:18-CV-01132-MHC

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**To: Spurs Sports & Entertainment
Attn: Jamie Martinez
1 AT&T Center Parkway
San Antonio, Texas 78219

☒ **Production: YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

Place: Alisa P. Cleek c/o Kim Tindall & Associates 16414 San Pedro Ave., Suite 900 San Antonio, Texas 78232	Date and Time: Tuesday, June 16, 2020 by 5:00 p.m. EST
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☐ **Inspection of Premises: YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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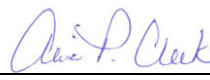
The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: June 2, 2020

CLERK OF COURT

Signature of Clerk or Deputy Clerk

OR


Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing **Defendant ATL Hawks, LLC**, who issues or requests this subpoena, is: **Alisa P. Cleek, Esq.; Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339; Email: acleek@taylorengh.com; Telephone: (770) 434-6868.**

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

Civil Action No. 1:18-CV-01132-MHC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* **Spurs Sports & Entertainment** on *(date)* June 2, 2020.

☐ I served the subpoena by delivering a copy to the named person as follows
on *(date)* _____; or

☐ I returned the subpoena unexecuted because _____; or

☒ other *(specify)*:

☒ other *(specify)*: **Spurs Sports & Entertainment, Attn: Jamie Martinez, 1 AT&T Center Pkwy., San Antonio, Texas 78219**, via U.S. Certified Mail, Return Receipt Requested, on June 2, 2020.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ 0.00 for travel and \$ 0.00 for services, for a total of \$0.00.

I declare under penalty of perjury that this information is true.

Date: June 2, 2020

Server's signature

Shera L. Hayes, Paralegal

Printed name and title

1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339

Server's address

Additional information regarding attempted service, etc:

ATTACHMENT

You are commanded to produce for inspection and copying no later than 5:00 p.m., Tuesday, June 16, 2020, records, documents and correspondence in your possession, custody or control pertaining to the employment and/or potential employment of **MARGO KLINE**, Social Security Number **XXX-XX-5267** date of birth [REDACTED]/1984, at **SPURS SPORTS & ENTERTAINMENT** and/or any of its agents, including, but not limited to: (1) employment applications and resumes; (2) intake questionnaires; (3) interview notes; (4) notes reflecting offers of employment; (5) documents regarding the extension of an offer of employment and acceptance thereof, including that of electronic mail; (6) payroll records; (7) performance evaluations; (8) documentation regarding any disciplinary action taken against **MARGO KLINE**; (9) correspondence and/or letters of resignation from **MARGO KLINE** including that of electronic mail; (10) non-privileged documentation regarding any administrative agency charges or lawsuits filed by **MARGO KLINE** against **SPURS SPORTS & ENTERTAINMENT**, and/or any of its agents; (11) all non-privileged documents relating to any allegations of or charges of discrimination and/or unlawful harassment, including but not limited to documents filed with any court; and (12) time sheets or detailed clock in and clock out reports.

PLEASE NOTE:

In lieu of personally appearing with the requested documents at the physical address indicated on the subpoena, it is requested that copies of the documents be emailed to Alisa P. Cleek(acleek@taylorenlish.com), Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339 (Telephone: 770-434-6868).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MARGO KLINE,

Plaintiff,

v.

ATL HAWKS, LLC,

Defendant.

Civil Action No. 1:18-CV-01132-MHC

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**To: Tampa Bay Rays Baseball Ltd.
Attn: John Higgins, Registered Agent
Tropicana Field
One Tropicana Drive
St. Petersburg, Florida 33705

☒ *Production:* **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

Place: Alisa P. Cleek c/o Phipps Reporting 5704 Holly Ct. Palm Harbor, Florida 34685-3133	Date and Time: Tuesday, June 16, 2020 by 5:00 p.m. EST
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☐ *Inspection of Premises:* **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.


Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: June 2, 2020

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk
Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing **Defendant ATL Hawks, LLC**, who issues or requests this subpoena, is: **Alisa P. Cleek, Esq.; Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339; Email: acleek@taylorenghish.com; Telephone: (770) 434-6868.**

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

Civil Action No. 1:18-CV-01132-MHC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* **Tampa Bay Rays Baseball Ltd.** on *(date)* June 2, 2020.

☐ I served the subpoena by delivering a copy to the named person as follows
on *(date)* _____; or

☐ I returned the subpoena unexecuted because _____; or

☒ other *(specify)*:

☒ other *(specify)*: **Tampa Bay Rays Baseball Ltd, Attn: John P. Higgins, Registered Agent, Tropicana Field, One Tropicana Drive, St. Petersburg, Florida 33705**, via U.S. Certified Mail, Return Receipt Requested, on June 2, 2020.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ 0.00 for travel and \$ 0.00 for services, for a total of \$0.00.

I declare under penalty of perjury that this information is true.

Date: June 2, 2020

Server's signature

Shera L. Hayes, Paralegal

Printed name and title

1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339

Server's address

Additional information regarding attempted service, etc:

ATTACHMENT

You are commanded to produce for inspection and copying no later than 5:00 p.m., Tuesday, June 16, 2020, records, documents and correspondence in your possession, custody or control pertaining to the employment and/or potential employment of **MARGO KLINE**, Social Security Number **XXX-XX-5267** date of birth [REDACTED]/1984, at **TAMPA BAY RAYS BASEBALL LTD.**, and/or any of its agents, including, but not limited to: (1) employment applications and resumes; (2) intake questionnaires; (3) interview notes; (4) notes reflecting offers of employment; (5) documents regarding the extension of an offer of employment and acceptance thereof, including that of electronic mail; (6) payroll records; (7) performance evaluations; (8) documentation regarding any disciplinary action taken against **MARGO KLINE**; (9) correspondence and/or letters of resignation from **MARGO KLINE** including that of electronic mail; (10) non-privileged documentation regarding any administrative agency charges or lawsuits filed by **MARGO KLINE** against **TAMPA BAY RAYS BASEBALL LTD.**, and/or any of its agents; (11) all non-privileged documents relating to any allegations of or charges of discrimination and/or unlawful harassment, including but not limited to documents filed with any court; and (12) time sheets or detailed clock in and clock out reports.

PLEASE NOTE:

In lieu of personally appearing with the requested documents at the physical address indicated on the subpoena, it is requested that copies of the documents be emailed to Alisa P. Cleek(acleek@taylorenghish.com), Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339 (Telephone: 770-434-6868).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MARGO KLINE,

Plaintiff,

v.

ATL HAWKS, LLC,

Defendant.

Civil Action No. 1:18-CV-01132-MHC

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**To: Technology Association of Georgia, Inc.
Natalie Yvonne Asanti, Registered Agent
75 Fifth St NW, Ste. 625
Atlanta, Georgia 30308

☒ **Production: YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

Place: Alisa P. Cleek Taylor English Duma LLP 1600 Parkwood Circle, Suite 200 Atlanta, Georgia 30339	Date and Time: Tuesday, June 16, 2020 by 5:00 p.m. EST
--	--

☐ **Inspection of Premises: YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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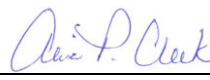
The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: June 2, 2020

CLERK OF COURT

Signature of Clerk or Deputy Clerk

OR


Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing **Defendant ATL Hawks, LLC**, who issues or requests this subpoena, is: **Alisa P. Cleek, Esq.; Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339; Email: acleek@taylorenghish.com; Telephone: (770) 434-6868.**

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

Civil Action No. 1:18-CV-01132-MHC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* **Technology Association of Georgia, Inc.** on *(date)* June 2, 2020.

☐ I served the subpoena by delivering a copy to the named person as follows
on *(date)* _____ ; or

☐ I returned the subpoena unexecuted because _____ ; or

☒ other *(specify)*:

☒ other *(specify)*: **Technology Association of Georgia, Attn: Natalie Yvonne Asanti, Registered Agent, 75 Fifth Street NW, Suite 625, Atlanta, Georgia 30308,,** via U.S. Certified Mail, Return Receipt Requested, on June 2, 2020.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ 0.00 for travel and \$ 0.00 for services, for a total of \$0.00.

I declare under penalty of perjury that this information is true.

Date: June 2, 2020

Server's signature

Shera L. Hayes, Paralegal

Printed name and title

1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339

Server's address

Additional information regarding attempted service, etc:

ATTACHMENT

You are commanded to produce for inspection and copying no later than 5:00 p.m., Tuesday, June 16, 2020, records, documents and correspondence in your possession, custody or control pertaining to the employment and/or potential employment of **MARGO KLINE**, Social Security Number **XXX-XX-5267** date of birth [REDACTED]/1984, at **TECHNOLOGY ASSOCIATION OF GEORGIA, INC.**, and/or any of its agents, including, but not limited to: (1) employment applications and resumes; (2) intake questionnaires; (3) interview notes; (4) notes reflecting offers of employment; (5) documents regarding the extension of an offer of employment and acceptance thereof, including that of electronic mail; (6) payroll records; (7) performance evaluations; (8) documentation regarding any disciplinary action taken against **MARGO KLINE**; (9) correspondence and/or letters of resignation from **MARGO KLINE** including that of electronic mail; (10) non-privileged documentation regarding any administrative agency charges or lawsuits filed by **MARGO KLINE** against **TECHNOLOGY ASSOCIATION OF GEORGIA, INC.**, and/or any of its agents; (11) all non-privileged documents relating to any allegations of or charges of discrimination and/or unlawful harassment, including but not limited to documents filed with any court; and (12) time sheets or detailed clock in and clock out reports.

PLEASE NOTE:

In lieu of personally appearing with the requested documents at the physical address indicated on the subpoena, it is requested that copies of the documents be emailed to Alisa P. Cleek(acleek@taylorenghish.com), Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339 (Telephone: 770-434-6868).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MARGO KLINE,

Plaintiff,

v.

ATL HAWKS, LLC,

Defendant.

Civil Action No. 1:18-CV-01132-MHC

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**To: UCF Athletics Association, Inc.
W. Scott Cole, Registered Agent
4000 Central Florida Blvd., Room 360
Millican Hall
Orlando, Florida 32816☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

Place: Alisa P. Cleek c/o Phipps Reporting 20 N. Orange Ave., Ste. 700 Orlando, Florida 32801	Date and Time: Tuesday, June 16, 2020 by 5:00 p.m. EST
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☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.


Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: June 2, 2020

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk
Attorney's signatureThe name, address, e-mail, and telephone number of the attorney representing **Defendant ATL Hawks, LLC**, who issues or requests this subpoena, is: **Alisa P. Cleek, Esq.; Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339; Email: acleek@taylorenghish.com; Telephone: (770) 434-6868.**

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

Civil Action No. 1:18-CV-01132-MHC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* **UCF Athletics Association, Inc.** on *(date)* June 2, 2020.

☐ I served the subpoena by delivering a copy to the named person as follows
on *(date)* _____; or

☐ I returned the subpoena unexecuted because _____; or

☒ other *(specify)*:

☒ other *(specify)*: **UCF Athletics Association, Inc. Attn: W. Scott Cole, Registered Agent, 4000 Central Florida Blvd., Room 360, Millican Hall, Orlando, Florida 32816**, via U.S. Certified Mail, Return Receipt Requested, on June 2, 2020.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ 0.00 for travel and \$ 0.00 for services, for a total of \$0.00.

I declare under penalty of perjury that this information is true.

Date: June 2, 2020

Server's signature

Shera L. Hayes, Paralegal

Printed name and title

1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339

Server's address

Additional information regarding attempted service, etc:

ATTACHMENT

You are commanded to produce for inspection and copying no later than 5:00 p.m., Tuesday, June 16, 2020, records, documents and correspondence in your possession, custody or control pertaining to the employment and/or potential employment of **MARGO KLINE**, Social Security Number **XXX-XX-5267** date of birth [REDACTED]/1984, at **UCF ATHLETICS ASSOCIATION, INC.**, and/or any of its agents, including, but not limited to: (1) employment applications and resumes; (2) intake questionnaires; (3) interview notes; (4) notes reflecting offers of employment; (5) documents regarding the extension of an offer of employment and acceptance thereof, including that of electronic mail; (6) payroll records; (7) performance evaluations; (8) documentation regarding any disciplinary action taken against **MARGO KLINE**; (9) correspondence and/or letters of resignation from **MARGO KLINE** including that of electronic mail; (10) non-privileged documentation regarding any administrative agency charges or lawsuits filed by **MARGO KLINE** against **UCF ATHLETICS ASSOCIATION, INC.**, and/or any of its agents; (11) all non-privileged documents relating to any allegations of or charges of discrimination and/or unlawful harassment, including but not limited to documents filed with any court; and (12) time sheets or detailed clock in and clock out reports.

PLEASE NOTE:

In lieu of personally appearing with the requested documents at the physical address indicated on the subpoena, it is requested that copies of the documents be emailed to Alisa P. Cleek(acleek@taylorenghish.com), Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339 (Telephone: 770-434-6868).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MARGO KLINE,

Plaintiff,

v.

ATL HAWKS, LLC,

Defendant.

Civil Action No. 1:18-CV-01132-MHC

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**To: The University Athletic Association, Inc.
Melissa Stuckey, Registered Agent
121 Gale Lemerand Dr.
Ben Hill Griffin Stadium
Gainesville, Florida 32611☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

Place: Alisa P. Cleek c/o Phipps Reporting 2828 NW 105 th Dr. Gainesville, Florida 32606-7518	Date and Time: Tuesday, June 16, 2020 by 5:00 p.m. EST
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☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.


Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: June 2, 2020

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk
Attorney's signatureThe name, address, e-mail, and telephone number of the attorney representing **Defendant ATL Hawks, LLC**, who issues or requests this subpoena, is: **Alisa P. Cleek, Esq.; Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339; Email: acleek@taylorenghish.com; Telephone: (770) 434-6868.**

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

Civil Action No. 1:18-CV-01132-MHC

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* **The University Athletic Association, Inc.** on *(date)* June 2, 2020.

☐ I served the subpoena by delivering a copy to the named person as follows
on *(date)* _____; or

☐ I returned the subpoena unexecuted because _____; or

☒ other *(specify)*:

☒ other *(specify)*: **The University Athletic Association, Inc. Attn: Melissa Stuckey, Registered Agent, 121 Gale Lemerand Dr., Ben Hill Griffin Stadium, Gainesville, Florida 32611**, via U.S. Certified Mail, Return Receipt Requested, on June 2, 2020.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ 0.00 for travel and \$ 0.00 for services, for a total of \$0.00.

I declare under penalty of perjury that this information is true.

Date: June 2, 2020

Server's signature

Shera L. Hayes, Paralegal

Printed name and title

1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339

Server's address

Additional information regarding attempted service, etc:

ATTACHMENT

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PLEASE NOTE:

In lieu of personally appearing with the requested documents at the physical address indicated on the subpoena, it is requested that copies of the documents be emailed to Alisa P. Cleek(acleek@taylorenghish.com), Taylor English Duma LLP, 1600 Parkwood Circle, Suite 200, Atlanta, Georgia 30339 (Telephone: 770-434-6868).